

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BLUEFIELD DIVISION

FREEDOM FROM RELIGION
FOUNDATION, INC.,
JANE DOE, individually, and on behalf
of JAMIE DOE,

Plaintiffs,

V.

MERCER COUNTY BOARD OF
EDUCATION,
MERCER COUNTY SCHOOLS,
DEBORAH S. AKERS, individually and
in her official capacity as superintendent
of Mercer County Schools,

Defendants.

Civil Action No. 1:17-cv-00642

**DECLARATION OF JANE DOE IN SUPPORT OF MOTION FOR
LEAVE TO PROCEED USING PSEUDONYMS AND FOR
PROTECTIVE ORDER**

I declare as follows:

1. I am a plaintiff in the above-captioned case, as is my child, Jamie Doe.
2. My child is a kindergarten student in an elementary school in Mercer

**EXHIBIT A TO BRIEF IN SUPPORT OF MOTION FOR
LEAVE TO USE PSEUDONYMS AND FOR PROTECTIVE ORDER**

County.

3. I understand that the Complaint and other documents filed with the Court in this suit use pseudonyms when referring to my child and me.
4. I elected to bring this suit on the understanding that my identity would not be disclosed. I wish to remain anonymous and proceed using a pseudonym to avoid mental and physical harm.
5. Maintaining anonymity is important to me because I fear that if my involvement were made public, my child and I would experience social ostracism, harassment, and threats from community members.
6. I am especially concerned about potential mistreatment of Jamie by school staff, other parents, as well as students.
7. I am aware that many of my fellow community members have very passionate feelings, including anger, in response to my objection to the bible classes.
8. I am aware that numerous hateful messages have been posted online about me and my beliefs.
9. These messages have often called for me to remove my child from the school system or to move outside of Mercer County.
10. For example, on January 21, 2017, in response to a Tristate Update post on Facebook, Rachel Duncan posted a statement which said in part, “get a

life suck it up and move outta mercer county, we don't need non believers n this county anyways we got enuff idiots as it is and u just add to the mix..."

A true and correct copy of the Facebook post that I read is attached hereto as Exhibit A1.

11. I am aware that some messages have called for violence directed at me.

12. For example, on January 20, 2017, in response to a WCHS & WVAH TV post on Facebook, Slone Nicole Tawnya posted, "ridiculous she needs punched in her mouth sorry not sorry." A true and correct copy of the Facebook post that I read is attached hereto as Exhibit A2.

13. On January 21, 2017, in response to a Fox News post on Facebook, David King posted, "...thou shall not suffer a witch to live...(kill it)." A true and correct copy of the Facebook post that I read is attached hereto as exhibit A3.

14. On January 19, 2017, Sheila D. Long posted on Facebook, "Just got a text:some idiot is filing a federal lawsuit over Mercer county Bible in the school program...we need to find out who this idiot or idiots are and get them a one way ticket to Iran...are we going to sit back and let this happy in Mercer County...or are we going to stand up and fight the idiots..." A true and correct copy of the Facebook post that I read is attached hereto as Exhibit A4.

and correct copy of the Facebook post that I read is attached hereto as Exhibit A4.

15. I fear that if people were to learn my or my child's identity, we would be subject to this hostility personally.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Mercer County, West Virginia, 2/6/, 2017


Jane Doe



Rachel Duncan

January 21 at 6:11pm · 🌐

I am sorry, ima let it out, IDK who this dumb b**ch is bt she and her family really need 2 get a grip on life, ain't nobody forcing ur child 2 attend the Bible classes n school that's a choice rather they want 2 or not seems to me ur a low life that don't wanna get out here in life and work and get money the honest way, u just lookin 4 a hand out n life, but I promise u this God will not let this go thru I promise, get a life suck it up and move outta mercer county, we don't need non believers n this county anyways we got enuff idiots as it is and u just add to the mix,.... #getalife #getoutofourcounty #getajob #getcashthehonestway #DUMBASSES..... It's a shame u wanna get out here and file a suit and hide yours and your family's name, but that's ok u can't and want hide from God



Mother sues to stop Bible classes in West Virginia schools

A kindergartner's mother is suing her public school system in West Virginia, asking that it discontinue a 75-year practice of putting kids in Bible classes that violate the U.S. and state constitut...

TRISTATEUPDATE.COM | BY CRAIG POOLE



Slone Nicole Tawnya shared WCHS & WVAH TV's post.

January 20 at 11:00pm · 🌐

ridiculous she needs punched in her mouth sorry not sorry



WCHS & WVAH TV

January 20 at 7:00pm · 🌐

👍 Like Page

What is your opinion of voluntary Bible classes offered in Mercer County elementary and middle schools?



Mother sues to stop Bible classes in West Virginia schools

A kindergartner's mother is suing her public school system in West Virginia, asking that it discontinue a 75-year practice of putting kids in Bible classes that violate...

WCHSTV.COM | BY AP





Sheilah D Long

January 19 at 5:35pm · 🌐

Just got a text:some idiot is filing a federal lawsuit over Mercer county Bible in the school program....we need to find out who this idiot or idiots are and get them a one way ticket to Iran....are we going to sit back and let this happen in Mercer county....or are we going to stand up and fight the idiots....I for one will fight....people we can not let this happen again God is getting tired now....and destruction will come if we do not stand up and fight....start calling AKERS the governor,senators,Congress,any one in officeTELL THEM WE ARE NOT GONNA TAKE IT ANYMORE....WE ARE NOT LOSING OUR RIGHT TO TEACH THE BIBLE TO OUR KIDS....